

Status of Activities Related to Power Mobility Devices (PMDs)

October 14, 2005

Recently, the Centers for Medicare & Medicaid Services (CMS) has been working on a number of important regulatory and administrative initiatives related to the prescription, coding and coverage of power mobility devices in response to the significant growth in expenditures for these items under the Medicare program. The goal of these initiatives is to ensure that beneficiaries have access to the appropriate technology to meet their needs, and support appropriate payments by Medicare. The purpose of this announcement is to provide an update on these important initiatives as CMS proceeds with implementation.

Key Initiatives

- ***PMD Regulation***--On August 26, 2005, CMS published an Interim Final Rule with Comment Period (IFC) to implement clinical conditions for coverage of PMDs. The IFC includes the requirement that a physician or other treating practitioner conduct a face-to-face examination of the patient when prescribing PMDs as mandated by the Medicare Modernization Act of 2003; and expands the types of physician or other treating practitioner who may prescribe power operated vehicles (POVs or scooters). The regulation also eliminates Certificates of Medical Necessity (CMNs) for power wheelchairs and power scooters (power mobility devices or PMDs). The regulation will be effective on October 25, and CMS is accepting comments until November 25, 2005.
- ***New Billing Codes for PMDs***--In February 2005, CMS issued 49 new Healthcare Common Procedure Coding System (HCPCS) codes for PMDs, and established product testing requirements for them to ensure that products can be grouped together based on industry standards for performance and durability. The new codes were scheduled to be implemented on January 1, 2006. On September 14, 2005, CMS revised these codes, adding 13 new codes and modifying a number of the testing requirements. CMS now plans to delay implementation of these new codes until it has an opportunity to review the changes with input from manufacturers, suppliers, and other stakeholders.
- ***Local Coverage Determination***--Also on September 14, 2005, the Durable Medical Equipment Regional Carriers (DMERCs) posted draft Local Coverage Determinations (LCDs) and policy articles on their websites to address payment and coverage of PMDs, and other issues. Due to the delay in implementing the new codes, the DMERCs will: 1) update their current LCDs for power wheelchairs (including the existing four codes K0010, K0011, K0012, and K0014 that have been in effect since 1993), manual wheelchairs, and scooters (code E1230) so that those policies accurately reflect the National Coverage Determination (NCD) coverage criteria; 2) continue to solicit and review comments on all aspects of the draft LCDs with the exception of the HCPCS codes; and 3) consider all comments developing new LCDs that will incorporate

the new coding structure and which will go into effect at the same time that the codes take effect.

Provider/Supplier Education

Since the issuance of the NCD, IFC, and codes, CMS and its contractors have been educating suppliers, the medical community and others regarding these important changes in PMD coverage and payments. Education and outreach activities include use of the CMS web-site, listserv announcements, MedLearn articles, and Open Door Forums. Also, CMS released detailed guidance addressing such issues as documentation requirements to prescribing physicians of PMDs. Some of the key guidance documents currently available are referenced below:

1. Mobility Assistive Equipment National Coverage Determination:

<http://www.cms.hhs.gov/coverage/wheelchairs.asp>

CMS has provided one-stop-shopping on this web-site for those documents that are particularly relevant for PMD prescribers. Physicians and other treating practitioners can access these documents from this single page on the coverage website rather than separately accessing the Federal Register and multiple CMS manuals. These documents include:

- The Mobility Assistive Equipment (MAE) Decision Memorandum
- The MAE National Coverage Determination (NCD)
- The MAE Coverage Algorithm
- The Recommendation of the Interagency Wheelchair Work Group (IWWG)
- The Power Mobility Device (PMD) Interim Final Rule with Comment (CMS-3017-IFC) text
- A Fact Sheet on the PMD IFC
- Questions and Answers on the MAE NCD, the PMD IFC, the elimination of the CMN, and the DMERCs LCD process

2. Medicare Program Integrity Manual Change Request 3952:

http://www.cms.hhs.gov/manuals/pm_trans/R124PI.pdf

3. Documentation Requirements in the DMERC Draft LCDs for PMDs:

<http://www.cignamedicare.com/MDCorner/Documentation/PMD.html>

<http://www.tricenturion.com>

<http://www.adminastar.com/Providers/DMERC/MedicalPolicy/files/DraftLCDPAPowerMobilityDevices.htm>

<http://palmettogba.com>

http://cignagovernmentservices.com/dmerc/lmrp_lcd/draft/PMD.html

4. CMS MedLearn articles associated with these initiatives can be found on CMS's Web-site at the following addresses:

<http://www.cms.hhs.gov/medlearn/matters/mmarticles/2005/MM3952.pdf>

<http://www.cms.hhs.gov/medlearn/matters/mmarticles/2005/MM3791.pdf>